



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AAS/RMP
F. #2021R00600

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 25, 2025

By Email and ECF

Kenneth Abell
Jarrod L. Schaeffer
Abell Eskew Landau LLP
256 Fifth Avenue, 5th Floor
New York, NY 10001

Re: United States v. Sun, et. al.
Criminal Docket No. 24-CR-346 (BMC)

Dear Counsel:

This letter will be accompanied by a link, sent by separate e-mail, to the secure download of certain discovery materials produced pursuant to Rule 16 of the Federal Rules of Criminal Procedure. The government renews its request for reciprocal discovery from the defendants.

The following documents were obtained by the government during the course of the investigation:

Bates No.	Description of Item
EDNY 052647-EDNY 052657	Search warrant to Apple (22-MC-297)
EDNY 052658-EDNY 052669	Search warrant to Google (22-MC-858)
EDNY 052670-EDNY 052690	Search warrants to Apple and Google (24-MC-466)
EDNY 052691-EDNY 052700	Search warrant to Apple (24-MC-466)
EDNY 052701-EDNY 052711	Search warrant to Google (24-MC-2168)
EDNY 052712-EDNY 052725	Search warrant (24-MC-2169)
EDNY 052726-EDNY 052743	Search warrants (24-MC-2841)
EDNY 052744-EDNY 052757	Search warrants (24-MC-2869)
EDNY 052758-EDNY 052761	Search warrant (24-MC-3106)
EDNY 052762-EDNY 052769	Search warrant to Shopify (24-MC-3252)
EDNY 052770-EDNY 052783	Search warrants (24-MC-3388)
EDNY 052784-EDNY 052937	Search warrant and affidavit (25-MC-728)

You may examine the physical evidence discoverable under Rule 16, including original documents and items, by calling us to arrange a mutually convenient time.

Very truly yours,

JOHN J. DURHAM
United States Attorney
Eastern District of New York

By: /s/ Alexander A. Solomon
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